

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

IN RE:

**DAVID P. WILLIAMS
HEATHER D. WILLIAMS,**

DEBTORS.

**Case No.: BK-15-10850-M
Chapter 13**

OBJECTION TO CHAPTER 13 PLAN OF DEBTORS

Comes now the secured creditor, Bank of America, N.A., by their attorney, Jim Timberlake, and hereby objects to the Chapter 13 Plan of Debtors. In support of this Objection, Bank of America, N.A. would show the Court as follows:

1. Bank of America, N.A. is the holder of a purchase money note and mortgage on the residence, ("mortgaged property") of Debtors. Said note and mortgage has an estimated balance of \$318,450.13 plus accruing interest along with reasonable attorney fees and for all costs of the action.

2. The proposed Chapter 13 Plan of the Debtors reflects an arrearage amount of \$32,500.00. Bank of America, N.A. disputes this amount and would propose that the estimated arrearage amount is \$328,284.29.

WHEREFORE, PREMISES CONSIDERED, secured creditor, Bank of America, N.A., moves the Court to reject the proposed Chapter 13 Plan of Debtors and/or to grant adequate protection or such other and further relief as may be entitled.

BANK OF AMERICA, N.A.,

By: s/ Jim Timberlake
JIM TIMBERLAKE - #14945
Baer Timberlake, P.C.
4200 Perimeter Center, Suite 100
Oklahoma City, OK 73102
Telephone: (405) 842-7722
Fax: (918) 491-5424
Attorney for Movant

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the above and foregoing Objection with postage thereon fully prepaid to the parties listed below on July 29, 2015.

David P. Williams
148 E 57th Street
Tulsa, OK 74105

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

Lonnie D. Eck
P.O. Box 2038
Tulsa, OK 74101

Matthew E. Riggin
2017 S Elm Place, Ste 107
Broken Arrow, OK 74012

By: s/ Jim Timberlake
JIM TIMBERLAKE - #14945
Baer Timberlake, P.C.
4200 Perimeter Center, Suite 100
Oklahoma City, OK 73102
Telephone: (405) 842-7722
Fax: (918) 491-5424
Attorney for Movant